

JENNIFER BERGH
 Nevada Bar No. 14480
QUILLING SELANDER LOWNDS
WINSLETT & MOSER, P.C.
 2001 Bryan Street, Suite 1800
 Dallas, Texas 75201
 Telephone: (214) 560-5460
 Facsimile: (214) 871-2111
jbergh@qslwm.com
COUNSEL FOR TRANS UNION LLC

****Designated Attorney for Personal Service****
 Trevor Waite, Esq.
 Nevada Bar No.: 13779
 6605 Grand Montecito Parkway, Suite 200
 Las Vegas, Nevada 89149

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

CAMILLE P. ALTAMURA,
 Plaintiff,
 v.
 TRANS UNION LLC, and JPMORGAN
 CHASE BANK, N.A.,
 Defendants.

Case No. 2:21-cv-00385-GMN-BNW

JOINT MOTION AND ORDER
EXTENDING DEFENDANT TRANS
UNION LLC’S TIME TO FILE AN
ANSWER OR OTHERWISE
RESPOND TO PLAINTIFF’S
COMPLAINT
(FIRST REQUEST)

Plaintiff Camille P. Altamura (“Plaintiff”) and Defendant Trans Union LLC (“Trans Union”), by and through their respective counsel, file this Joint Motion Extending Defendant Trans Union’s Time to File an Answer or Otherwise Respond to Plaintiff’s Complaint.

1. On March 8, 2021, Plaintiff filed her Complaint. The current deadline for Trans Union to answer or otherwise respond to Plaintiff’s Complaint is April 1, 2021.

2. On March 31, 2021, counsel for Trans Union communicated with Plaintiff’s counsel via email regarding an extension within which to file a response to the Complaint, and Plaintiff’s counsel agreed to the extension.

3. The parties are actively discussing a potential early resolution of this case, and the parties believe an extension of this nature may save waste of the parties’ time and expense. The

1 additional time will allow Plaintiff and Trans Union time to fully explore such early settlement
 2 discussions. Moreover, Trans Union's counsel will need additional time to review the
 3 documents and respond to the allegations in Plaintiff's Complaint. This Joint Motion is made
 4 in good faith and not for the purposes of delay.

5 4. Plaintiff has agreed to extend the deadline in which Trans Union has to answer or
 6 otherwise respond to Plaintiff's Complaint up to and including May 1, 2021. This is the first
 7 motion for extension of time for Trans Union to respond to Plaintiff's Complaint.

8 Dated this 1st day of April 2021.

9 **Quilling Selander Lownds**
 10 **Winslett & Moser, P.C.**

11 /s/ Jennifer Bergh

12 Jennifer Bergh
 13 Nevada Bar No. 14480
 14 2001 Bryan Street, Suite 1800
 15 Dallas, Texas 75201
 16 (214) 560-5460
 17 (214) 871-2111 Fax
 18 jbergh@qslwm.com
 19 ***Counsel for Trans Union LLC***

17 **Freedom Law Firm and Kind Law**

18 /s/ Michael Kind

19 George Haines
 20 Nevada Bar No. 9411
 21 Gerardo Avalos
 22 Nevada Bar No. 15171
 23 8985 S. Eastern Ave, Suite 350
 24 Las Vegas, NV 89123
 25 (702) 880-5554
 26 (702) 385-5518 Fax
 27 ghaines@freedomlegalteam.com


28 *and*

Michael Kind
 Nevada Bar No. 13903
 8860 South Maryland Parkway, Suite 106
 Las Vegas, NV 89123
 (702) 337-2322
 (702) 329-5881 Fax
Counsel for Plaintiff

ORDER

The Joint Motion for Extension of Time for Trans Union LLC to file an answer or otherwise respond to Plaintiff's Complaint is so ORDERED AND ADJUDGED.

Dated April 6, 2021.



UNITED STATES MAGISTRATE JUDGE